

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUGHES RIVER FM, LLC,
a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,
a Cayman Islands corporation,

YU JIANJUN,
an individual,

SEAMAN YU,
an individual,

XIAOYU CHEN,
an individual,

LI HAIBO,
an individual, and

TENCENT MUSIC ENTERTAINMENT
GROUP, INC.,
a Cayman Islands corporation,

Defendants.

Case No. 1:25-cv-06217

Hon. Judge Edmond E. Chang

**DEFENDANT TENCENT MUSIC ENTERTAINMENT GROUP'S
MOTION TO DISMISS UNDER RULES 12(B)(2) AND 12(B)(6)
AND FORUM NON CONVENIENS**

Defendant Tencent Music Entertainment Group (“TME”), by and through its undersigned counsel, hereby moves this Court for an Order dismissing with prejudice Counts Seven and Eight of Hughes River FM, LLC’s Amended Complaint, filed in the above-captioned action on July 28, 2025, pursuant to Federal Rules of Civil Procedure 12(b)(2) and Rule 12(b)(6), or alternatively on *forum non conveniens* grounds. The reasons for and supporting this motion are set forth in a memorandum filed by TME contemporaneously with this motion. TME’s counsel has conferred

with Plaintiff's counsel regarding this motion, and Plaintiff has confirmed that this motion is contested.

Dated: August 27, 2025

Respectfully submitted,

/s/ Peter P. Tomczak

Peter P. Tomczak

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